

UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

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IN RE:

Lawrence C. Greene

Debtor

Case No.: 18-15195-AMC

Chapter 13

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**MOTION TO MODIFY PLAN AFTER CONFIRMATION**

The Debtor, Lawrence C. Greene, by and through his undersigned counsel, hereby move to modify his Chapter 13 Plan and in support thereof aver as follows:

1. Debtor filed a Chapter 13 Bankruptcy on or about August 6, 2018.
2. The Chapter 13 filing was assigned case number 18-15195-AMC.
3. The Chapter 13 Plan was confirmed by this Honorable Court on or about February 13, 2019.
4. On or about November 13, 2019 the Debtor and the mortgagee, entered into a Stipulation resolving the pending Motion for Relief.
5. Per the November 13, 2019 Stipulation, the Debtor is delinquent in the sum of \$1,505.53 in post-petition mortgage payments and attorney's fees and costs. A true and correct copy of the Stipulation is attached hereto as "**Exhibit A.**"
6. In accordance with the Stipulation, specifically paragraph number 4, the Debtor will cure the subject \$474.53, upon execution of the Stipulation or prior to November 31, 2019.
7. In accordance with the Stipulation, within ten (10) days from the date that the stipulation is approved by the court, debtor will amend the Chapter 13 plan to include the remaining post-petition delinquency in the amount of \$1,031.00.

8. In furtherance of the Stipulation and the Debtor curing the post-petition delinquency, this Motion and Modified Chapter 13 Plan are being contemporaneously filed.

9. The Debtor's proposed modified Chapter 13 Plan is attached hereto as "**Exhibit B**", and is affordable to the Debtor.

**WHEREFORE**, the Debtor requests that he be permitted to modify his Chapter 13 Plan for the above-stated reasons.

Dated: November 27, 2019

/s/Brad J. Sadek, Esq.  
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